

Holland & Knight

701 Brickell Avenue, Suite 3300 | Miami, FL 33131 | T 305.374.8500 | F 305.789.7799
Holland & Knight LLP | www.hklaw.com

Jesús E. Cuza
305 789 7513
jesus.cuza@hklaw.com

August 15, 2023

The Honorable Pamela K. Chen, U.S.D.J
United States District Court, Eastern District of New York
Courtroom: 4F; Chambers: N 631
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Case 1:21-cv-01540 Wilmington Trust, N.A, v. Segal.

Motion for Leave to Obtain Sealed Document

Dear Judge Chen,

We represent Wilmington Trust, N.A. (“Securities Intermediary”), in the above-referenced matter. Securities Intermediary, by and through counsel, moves the Court for leave to obtain access to the Court’s November 14, 2022 Sealed Partial Final Judgment [DE 46].

In support of this Motion, Securities Intermediary notes that Your Honor signed and sealed the unredacted Partial Final Judgment on November 14, 2022 [DE 46]. Undersigned counsel, Jesus E. Cuza from Holland & Knight LLP, has previously entered a *pro hac vice* appearance as counsel of record in this case [DE 21]. Undersigned counsel needs access to the above-referenced document and respectfully requests that the Court authorize a release of a certified copy of the unredacted judgment to Holland & Knight LLP.

Based on the foregoing, Securities Intermediary hereby respectfully moves for an Order permitting Holland & Knight, LLP to obtain access to the sealed Partial Final Judgment entered on November 14, 2022 [DE 46]. Should the Court require any additional information, please do not hesitate to contact us.

Sincerely,

HOLLAND & KNIGHT LLP


Jesus E. Cuza

copy to: All attorneys of record via ECF
Defendant Herman Segal, by email